

HIPAA: A PRACTICAL GUIDE FOR PHYSICIANS' PRACTICES

MASTER HIPAA COMPLIANCE TASK MATRIX

Period	Compliance Administration	Facilities	Computers and Information Systems	Workforce	Business Associates	Patient Relations Policies	Transactions
Q3 01	<ol style="list-style-type: none"> 1. Appoint individual with primary planning responsibility 2. Appoint any secondary personnel needed to provide expertise. 3. Budget time and funds for education as well as planning. 4. Educate principals, board, senior executives as to need for compliance. 5. Establish procedures for reporting to and decisions by principals, board, senior executives. 6. Identify any major strategic plans with implications for facilities, major equipment or workforce 	<ol style="list-style-type: none"> 1. Identify all sites where Protected Health Information is received, used, stored, processed and transmitted. 2. Identify processes used to manage access to Protected Health Information at all identified sites. 3. Assemble any policies concerning security of and access to facility sites. 	<ol style="list-style-type: none"> 1. Identify all equipment used to receive, provide, store, process or transmit Protected Health Information. 2. Identify all electronic media used to enter, store, process or transmit Protected Health Information. 3. Identify all vendors providing services processing, storage or transmission of Protected Health Information. 4. Identify processes used to manage access to equipment used to enter, receive, 	<ol style="list-style-type: none"> 1. Identify all workforce positions involving interaction with Protected Health Information. 2. Begin categorization of purposes for interaction with Protected Health Information, by workforce position. 3. Assemble existing policies concerning workforce protection, use and disclosure of Protected Health Information. 4. Assemble existing job descriptions. 5. Assemble existing employment policies, confidentiality agreements, employment agreements. 	<ol style="list-style-type: none"> 1. No specific activities this period. 	<ol style="list-style-type: none"> 1. Assemble existing consent, authorization forms and notices to patients. 2. Assemble existing policies on patient review, copying and amendment of records. 3. Identify personnel responsible for administration of Privacy Policies 	<ol style="list-style-type: none"> 1.

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"HIPAA: A Practical Guide for Physicians' Practices"

For further information contact the author at 206.386.7520 or by e-mail at jrchristiansen@stoel.com.

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	<p>changes over next two years.</p> <p>7. Integrate or coordinate compliance plan with strategic plan.</p> <p>8. Develop preliminary compliance plan.</p> <p>9. Consider possible need for outside assistance.</p> <p>10. Report to principals, board, senior executives.</p>		<p>provide, store, process or transmit Protected Health Information.</p> <p>5. Assemble all policies concerning security of all identified equipment, media.</p>				
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Q4 01	<ol style="list-style-type: none"> 1. Estimate reasonable compliance expenses for major cost items. 2. Consider alternatives for major expense or inconvenience items 3. Establish facility acquisition or modification plan and estimated budget. 4. Establish equipment acquisition or upgrade plan and estimated budget. 5. Establish plan for workforce additions or enhancements, and estimated budget. 6. Establish plan and estimated budget for 	<ol style="list-style-type: none"> 1. Identify facility-based risks to Protected Health Information. 2. Develop plan for eliminating or mitigating identified facility - based risks. 3. Review plan with legal counsel, risk management 	<ol style="list-style-type: none"> 1. Identify equipment-based risks to Protected Health Information. 2. Develop plan for eliminating or mitigating identified equipment-based risks. 3. Review plan with legal counsel, risk management. 	<ol style="list-style-type: none"> 1. Continue preceding activities. 	<ol style="list-style-type: none"> 1. No specific activities this period. 	<ol style="list-style-type: none"> 1. Continue preceding activities this period. 	<ol style="list-style-type: none"> 1.

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	major vendor changes. 7. Recommend preliminary plans and budget to principals, board, senior executives.						
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Q1 02	1. Adopt preliminary plan and budget.	1. Begin contract process for any major facilities modifications. 2. Begin any major construction as soon as reasonably possible.	1. Begin contract process for any major equipment acquisitions, upgrades. 2. Begin contract process for any major vendor changes.	1. Begin to educate workforce on coming changes. 2. Review existing workforce job descriptions, policies and agreements for compliance purposes. 3. Begin developing internal "minimum disclosure" policies.	1. Inventory other organizations with which you share Protected Health Information routinely. 2. Contact counterparts in major organizations with which you share information routinely. 3. Identify types of other organizations, individuals with which you share Protected Health Information episodically.	1. Continue preceding activities this period. 2. Identify personnel at other organizations with which you share information routinely to begin planning for coordination of policies and procedures.	1.

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Q2 02	1. Report on status of plan and budget to principals, board, senior executives.	1. Continue preceding activities this period.	1. Continue preceding activities this period. 2. Develop or modify security policies for computers and electronic systems. 3. Develop or modify job descriptions for computer and electronic systems security personnel.	1. Continue preceding activities this period. 2. Identify sources of workforce training in privacy, security compliance.	1. Continue preceding activities this period.	1. Continue preceding activities this period.	1.

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Q3 02	<ol style="list-style-type: none"> 1. Conduct gap analysis in all plan areas. 2. Review status of budget. 3. Report on status of plan and budget to principals, board, senior executives. 4. Modify budget if materially short of projected needs. 	<ol style="list-style-type: none"> 1. Continue preceding activities this period. 2. Develop or modify security policies for facilities security. 3. Develop or modify job description for facilities security personnel. 	<ol style="list-style-type: none"> 1. Continue preceding activities this period. 	<ol style="list-style-type: none"> 1. Complete revisions to workforce job descriptions, employment policies and employment agreements. 2. Complete "minimum disclosure" policies and procedures. 3. Review revised job descriptions, employment policies, employment agreements, "minimum disclosure" policies and procedures with legal counsel, risk management. 4. Begin workforce privacy and security training. 	<ol style="list-style-type: none"> 1. Develop contracting strategies with major organizations with which you share Protected Health Information routinely. 2. Begin developing external "minimum disclosure" policies and procedures with major organizations to with which you share information routinely. 3. Begin developing processes and procedures for coordination of patient information review and amendment with major business associates (where applicable). 	<ol style="list-style-type: none"> 1. Develop revised forms for privacy notice, consent, authorization. 2. Develop policies and procedures for patient review, copying, amendment of information. 3. Develop procedures for marketing or fund-raising "opt-out" if applicable. 4. Develop procedures for internal accounting of disclosures. 5. Develop privacy officer job description. 	<ol style="list-style-type: none"> 1.

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					<p>4. Begin developing processes and procedures for coordination of accounting of disclosures with major Business Associates (where applicable).</p> <p>5. Develop form and procedures for episodic business associate contracting.</p> <p>6. Review processes, procedures, contract forms and contracting strategies with legal counsel, risk management.</p>		
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Q4 02	<ol style="list-style-type: none"> 1. Conduct final gap analysis in all areas. 2. Conduct final legal and risk management review in all areas. 3. Review status of budget. 4. Report to principals, board, senior executives on status of plan and budget. 	<ol style="list-style-type: none"> 1. Complete all facility acquisitions and modifications. 2. Identify minor modifications and work-arounds still needed to manage facility- or equipment-based risks. 	<ol style="list-style-type: none"> 1. Complete all major computer and information system acquisitions and upgrades. 2. Complete contracting for all major information services vendor changes. 	<ol style="list-style-type: none"> 1. Complete all job description, employee policy, employment agreement revisions. 2. Complete all internal "minimum disclosure" policy and procedure documentation. 3. Continue workforce training. 	<ol style="list-style-type: none"> 1. Complete form for episodic business associate contract. 2. Continue working with major organizations with which you routinely share Protected Health Information to establish contracting regime, coordinated policies and documents 	<ol style="list-style-type: none"> 1. Complete development of all notices, consents, authorizations. 2. Complete all processes and procedures for patient review, copying and amendment of Protected Health Information. 3. Complete all procedures for internal accounting of disclosures. 4. Hire privacy officer. 	<ol style="list-style-type: none"> 5.

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Q1 03	<ol style="list-style-type: none"> 1. Review status of plan in all areas. 2. Review status of budget. 3. Report to principals, board, senior executive on status of all material items. 4. Approve all material items for adoption. 	<ol style="list-style-type: none"> 1. Complete all material items. 	<ol style="list-style-type: none"> 1. 	<ol style="list-style-type: none"> 1. Complete all documentation. 2. Complete initial workforce training. 	<ol style="list-style-type: none"> 1. Complete all material items. 	<ol style="list-style-type: none"> 1. Complete all material items. 	<ol style="list-style-type: none"> 2.